

CORNERSTONE

Environmental Group, LLC

90 Crystal Run Road, Suite 201 • Middletown, NY 10941 • (877) 294-9070 • Fax: (845) 692-5894

VIA E-MAIL AND US MAIL

December 2, 2011

Mr. Jonathan Gorin
Remedial Project Manager
United States Environmental Protection Agency, Region II
290 Broadway
19th Floor
New York, New York 10007-1866

Subject: Monthly Progress Report for November 2011
LCP Chemicals, Inc. Superfund Site (USEPA ID# NJD079303020)

Dear Mr. Gorin:

The following monthly progress report is submitted on behalf of ISP Environmental Services Inc. (IES) in satisfaction of the Section VIII.35 requirements of Administrative Order No. II CERCLA-02-99-2015 (hereinafter referred to as the Order) issued by USEPA and as executed by IES on May 13, 1999.

A "Gantt Chart" project schedule is provided as an attachment (Figure 1). This project schedule provides graphical representations of the project tasks and subtasks. Accordingly, the project schedule depicts the task completion through the end of the reporting month and provides an estimate of the timing of future tasks.

1. Previous Actions in Compliance with the Order

A. The following actions have been taken to comply with the Order during the previous month:

- Work on the preparation of the FS report continued including various report sections, figures, tables, appended support materials, and cost estimates.
- Evaluation of the results of the off-site ditch investigation was completed, and the draft final RI was revised.

B. The following documents were submitted to the agencies during the previous month:

- Monthly progress letter report dated November 3, 2011, including an updated project schedule dated November 1, 2011.
- Site monitoring letter report, dated November 3, 2011, for the fourth quarter of 2011.

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C. The following agency approvals were received during the previous month:

- None during the reporting period.

D. The following agency documents and correspondences were received during the previous month:

- None during the reporting period.

E. Other pertinent communications with the agencies during the previous month:

- None during the reporting period.

2. Future Actions, Data, and Plans

A. The following actions, data, and plans are scheduled to be conducted during the following two (2) months:

- Continue work on resolving comments from the USEPA on the *Draft Remedial Investigation Report* submitted by IES (awaiting response from the USEPA).
- Continue work on resolving comments from the USEPA on the *Draft Baseline Ecological Risk Assessment* submitted by IES (awaiting response from the USEPA).
- Complete work on the characterization of off-site ditches in accordance with the previously approved work plan and QAPP, and complete an update of the RI with the results of the ditch investigation.
- Complete a draft of the FS report and submit the draft to the USEPA.

B. Other information related to the progress of work:

- None during this reporting period.

3. Project Schedule

A. The percentage of completion of the project subtasks has been updated and is shown on the overall project schedule (Figure 1). Many of the schedule subtask details including the Phase I and Phase II RI field investigations and the treatability study determination process are 100% complete and have been collapsed for presentation brevity on Figure 1. Based on feedback from the USEPA, the schedule for completing the RI, including resolution of the USEPA's comments on the RI and ecological risk assessment, has been extended to coincide with the submittal of the final FS. The draft FS schedule has been adjusted to reflect submittal no later than the middle of December 2011 to permit sufficient time for the final internal review process by IES.

B. Delays that have been encountered or anticipated that may affect the future schedule for completion of the work:

- No specific delays are being encountered at this time, and the current schedule reflects the various activities underway as described above. However, responses are still pending from the USEPA on the remaining comments on the RI and the ecological risk assessment.

C. Description of efforts made to mitigate these delays or anticipated delays:

- None necessary at this time. The July 12, 2011 meeting with the USEPA and the Agency's concurrence on the alternatives to be evaluated in detail permit the FS process to continue per the attached schedule.

4. Funding Mechanism

- A. An Irrevocable Letter of Credit No. P-224827, issued by JP Morgan Bank effective April 25, 2002, and associated Standby Trust Agreement were issued in satisfaction of the financial assurance obligations of the Order as documented to USEPA in a letter from Celeste Wills, Esq. of IES, dated April 26, 2002.

If you or your staff has any questions or comments, please do not hesitate to contact David McNichol of IES at 973-628-3355.

Sincerely,

CORNERSTONE ENVIRONMENTAL GROUP, LLC



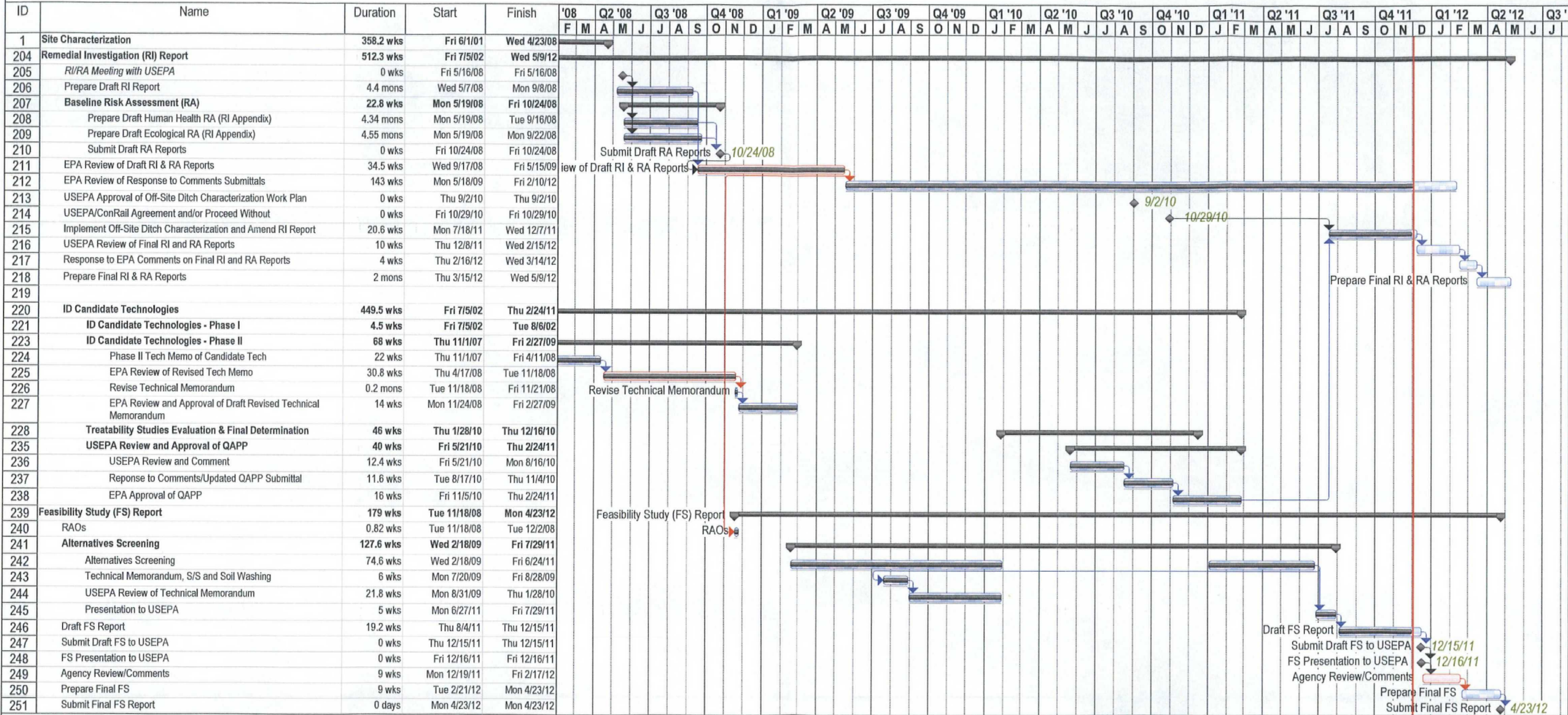
Gary J. DiPippo, P.E.
Manager, Hydrogeology and Remediation

Enclosure

cc: S. Miller, NJDHSS
F. Cardiello, Esq., USEPA
D. McNichol, IES
F. Boenning, Esq., IES
D. Toft, Esq.
G. Zervas, NJDEP

C. McGowan, IES
S. MacMillin, Brown and Caldwell
K. Tolson, Geosyntec
M. DeFlaun, Geosyntec
J. Kubitz, Entrix

Figure 1
RI/FS PROJECT SCHEDULE
LCP Chemicals, Inc. Superfund Site





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Environmental Group, LLC

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Middletown, NY 10941

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Mr. Frank Cardiello
USEPA, Region II
290 Broadway
New York, NY 10007-1866

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